	ED STATES DISTRICT COURT HERN DISTRICT OF NEW YORK
	X :
	; ;
	:CV(VEC)
	Plaintiff(s), : <u>MANAGEMENT PLAN</u> -v- : <u>AND SCHEDULING</u> ORDER
	MX COOR
	Defendant(s) :
Civ. P	This Civil Case Management Plan is submitted by the parties in accordance with Fed. R. 26(f)(3).
1.	All parties [consent do not consent] to conducting all further proceedings before a United States Magistrate Judge, including motions and trial. 28 U.S.C. § 636(c). The parties are five to withhold consent without adverse substantive consequences. If all parties consent, the remaining paragraphs need not be completed. In addition, they shall submit to the Court a fully executed Notice, Consent, and Reference of a Civil Action to a Magistrate Judge, available at http://nysd.uscourts.gov/file/forms/consent-w-proceed-before-us-magistrate-judge , within three days of submitting this Proposed Case Management Plan and Scheduling Order.]
2.	Except for amendments permitted by Fed P. Civ. P. 15(a)(1) and this Court's Individual Practices in Civil Cases ("Individual Practices"), amended pleadings may not be filed and additional parties may not be joined except with leave of the Court. Any motion to amend or to join additional parties shall be filed within days from the date of this Order. [Absent exceptional circumstances, a date not more than 30 days following the initial pretrial conference.]
3.	Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be completed no later than days from the date of this Order. [Absent exceptional circumstances, a date not more than 14 days following the initial pretrial conference.]
4.	[<i>If applicable</i>] The plaintiff(s) shall provide HIPAA-compliant medical records release authorizations to the defendant(s) no later than

Di	Discovery		
a.	All fact discovery shall be completed no later than [A date not more than 90 days following the initial pretrial conference, unless the Court finds that the case presents unique complexities or other exceptional circumstances.]		
b.	All expert discovery, including reports, production of underlying documents, and depositions, shall be completed no later than [Absent exceptional circumstances, a date not more than 45 days from the date in paragraph 5(a) (i.e., the completion of all fact discovery).]		
c.	Within two weeks of the date of entry of this Scheduling Order, the parties shall meet and confer in person to agree upon a joint plan for meeting the discovery deadlines.		
d.	In the case of discovery disputes, the parties should follow Local Civil Rule 37.2 with the following modifications: Any party wisning to raise a discovery dispute with the Court must first meet and confer in good faith with the opposing party, in person, or by telephone, in an effort to resolve the dispute. If this process fails are the Court's intervention is required, the carries must jointly call Chambers to schedule a joint teleconference with the Court for prompt resolution of the dispute. The Court will determine during the teleconference whether additional submissions will be required.		
	Junediate referral to a Magistrate Judge Dunsel for the parties believe the following alternative dispute resolution mechanisms as be helpful in resolving this case (check all that apply):		
	Referral to the District's Mediation Program after the close of fact discovery		
	Referral to a Magistrate Roge after the close of fact discovery Other		
Tł	is case [is/is not] to be tried to a jury.		
	her issues to be addressed at the Initial Pretrial Conference, including those set forth in d. R. Civ. P. 26(†,(3)), are set forth below.		

9.	This Order may not be modified or the date the Court for good cause shown. Unless the settlement negotiations must pursue settlem Parties should not assume that they will recessettlement negotiations fail. Any application be made by written application no later than be extended in accordance with the Court's	e Court orders otherwise, parties engagement and conduct discovery simultaneous eive an extension of an existing deadline on to modify or extend the dates herein at two business days before the date sough	ed in Isly. ne if shall
10.	The next pretrial conference is scheduled for Courtroom 443 of the Thurgood Marshall C York 10007. [Unless otherwise ordered, 16 for completion of all fact discovery as set for By Thursday of the week prior to that conference in a the status of the agent. The letter	Courthouse, 40 Foley Square, New York 0:00 a.m. on the first Friday after the departh in paragraph 5(a).] erence, the parties shall submit a joint leads to the parties of	eadline etter
	regarding the status of the case. The letter separate paragraphs:	stude include the following information	111 111
	a. a statement of all existing deadlines, du	e dates, and/or cut-off dates;	· . c
	b. a brief description of any outstanding m	(0):	KIMI
	c. a brief description of the status of disco needs to be completed;	very and of any additional discovery that	at
	d. a statement describing the status of any would like a settlement conference;	settlement discussions and whether the	parties
	e. a statement of the anticipated length of jury:	trial and whether the case is to be tried	to a
	f. a statement of whether any party anticipa motion to exclude expert testimony,	ones filing a motion for summary judgm	nent or
	g. any other issue that the parties would his	to address at the pretrial conference;	and
	h. any other information that the parties be case to settlement or triai.	elieve may assist the Court in advancing	g the
Couns	el for the Parties:		
	RDERED.		
Date:	New York, New York	VALERIE CAPRONI	
	THEW TULK, THEW TULK	United States District Judge	